

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

L. JOE PITTS, as Administrator of
the Estate of **SANDRA ANN**
SPENCER PITTS, Deceased,

PLAINTIFF,

VS.

BRIDGESTONE AMERICAS
HOLDINGS, INC.;
BRIDGESTONE FIRESTONE
NORTH AMERICAN TIRE, LLC;
and **BFS RETAIL AND**
COMMERCIAL OPERATIONS,
LLC, doing business as
FIRESTONE TIRE & SERVICE
CENTERS, jointly and severally,

DEFENDANTS.

CIVIL ACTION NUMBER:

2:06cv1008-ID-SRW

PLAINTIFF'S MOTION TO EXTEND COURT'S DEADLINE TO AMEND
PLEADINGS AND ADD PARTIES

COMES NOW the Plaintiff by and through the undersigned counsel of record and moves this Honorable Court to extend it's deadline for the parties to move to amend the pleadings and to add parties and as grounds therefore states as follows:

1. In Section 4 of the Court's February 15, 2007 "Uniform Scheduling Order" (Document No. 10) this Court set the deadline for parties to amend the pleadings and to add parties on or before April 25, 2007.

2. Although both parties are diligently pursuing discovery, no responses are currently due.

3. The parties will have a very limited opportunity to conduct discovery prior to the Court's April 25, 2007 deadline for the parties to move to amend and add other parties.

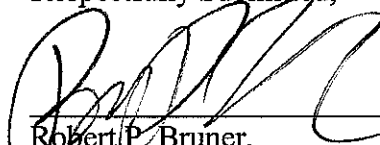
4. The parties have previously agreed that this deadline be set on or before July 1, 2007. (See Report of Rule 26(f) Planning Meeting, Document No. 7).

5. Earlier today, March 1, 2007, undersigned Plaintiff's counsel contacted counsel for the Defendants and at this time defense counsel again agreed to the requested deadline to amend or add parties of July 1, 2007.

6. No party will be prejudiced by extending this deadline as requested herein and doing so will allow both parties to complete sufficient discovery to make any necessary amendments to the pleadings or add any parties.

WHEREFORE, PREMISES CONSIDERED, Plaintiff moves this Honorable Court to extend the deadline stated in Section 4 of its February 15, 2007 Order (Document No. 10) to the July 1, 2007 deadline agreed upon by Plaintiff and Defendant.

Respectfully Submitted,


Robert P. Bruner,
Attorney for the Plaintiff

OF COUNSEL:

Lanny S. Vines, Esq.

Robert P. "Bo" Bruner, Esq.

LANNY VINES & ASSOCIATES, LLC

2142 Highland Avenue South

Birmingham, Alabama 35205-4002

Tel: 205-933-1277

Fax: 205-933-1272

CERTIFICATE OF SERVICE

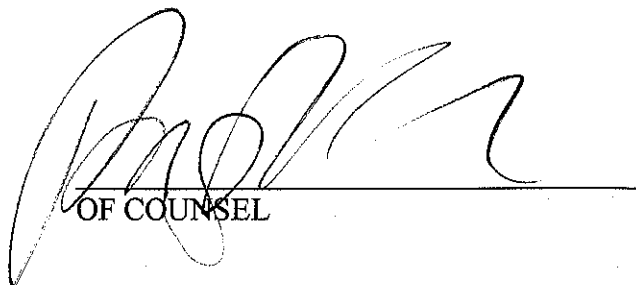
I hereby certify that on March 1, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Lanny S. Vines, Esq.
Robert P. "Bo" Bruner, Esq.
LANNY VINES & ASSOCIATES, LLC
2142 Highland Avenue South
Birmingham, Alabama 35205-4002

Brittin T. Coleman
Kenneth M. Perry
Hope T. Cannon
Bradley Arant Rose & White LLP
One Federal Place
1819 Fifth Avenue North
Birmingham, AL 35203-2104

and I hereby certify that I have mailed by United States Postal Service the foregoing to the following non-CM/ECF participants:

None


OF COUNSEL